

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                    )  
                                  )  
v.                             ) 03-12438-JGD  
88 LOVELLS LANE, MARSTON MILLS, )  
MASSACHUSETTS,                )  
                                  )  
Defendant.                    )

**JOINT STATEMENT MOTION TO EXTEND DISCOVERY**

The United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Victor Miller, by his attorney, Joseph J. Balliro, Jr., submit this Joint Motion seeking extension of the discovery and motions deadlines adopted by the Court pursuant to Local Rule 16.1. As grounds, the parties state that discovery has not been completed as anticipated, due, in part, to the fact that the undersigned Assistant has recently returned from an extended leave from the office.

The parties request that the relevant deadlines be extended for sixty days, that is:

- a. discovery, including interrogatories and document requests, and any necessary depositions to be completed by December 1, 2004;
- b. dispositive motions to be filed on or before January 3, 2005; and
- c. opposition to dispositive motions to be filed on or before January 17, 2005.

The parties request that the Court then schedule a hearing on dispositive motions, or act upon the motions without hearing if the Court decides no hearing is necessary. If the case is not disposed of by motion, the parties will confer and then seek an additional Scheduling Conference with respect to further conduct of the case.

The parties further request that the same pre-trial schedule be entered in the related case, U.S. v. 1969 Camaro, et al., (04-10445-PBS), which is based on the same factual investigation as the Complaint against the Defendant Real Property.

Respectfully submitted,

MICHAEL J. SULLIVAN.  
United States Attorney.

VICTOR MILLER,

/s/  
by: Shelby D. Wright  
Assistant U.S. Attorney  
John J. Moakley Federal  
Courthouse  
Suite 9200  
1 Courthouse Way  
Boston, MA 02210  
(617) 748-3283

/s/  
By: Joseph J. Balliro, Jr.  
Balliro & Mondano  
Suite 1800  
99 Summer Street  
Boston, MA 02110  
(617) 737-8442

Date: September 30, 2004